

Enclosure 2

Adapting Methyl Bromide Commodity Fumigation Conditions to ProFume

Reference Manual		
Page	Section	Notation
1	Second paragraph. Paragraph is MBr specific	Not applicable to ProFume
1	Fifth paragraph. DPR staff out-of-date	Worker Safety Branch contract is Harvard Fong. Enforcement Branch is Vic Acosta
5	Question #2: Maximum lb/day	MBr maximum 1000 lbs/day (24 hour period) would apply to ProFume
6	Question #5 asks if certain questions were answered yes and others no, then the enclosure complies and buffer zone sizes do not need to be computed. Is this true for SF? These are also mentioned on page 7.	Yes. The questions and actions based on the answers also apply to SF.
7	Maximum lb/day	See comment for page 5.
13	Table 1 list of velocities to determine standard height of an exhaust stack.	Use Table 1. It would apply to ProFume also.
21	Max lbs MBr is 8 lb/1000 cu.ft.	ProFume label is the same (128 oz/1000 cu.ft)
22	Maximum lb/day	See comment for page 5.
23	Multiple applications of MBr	Can there be multiple application of ProFume? Yes.
24-25	Fumigation in enclosed area	This may also be prohibited by the "Connected area" section in the ProFume label (3 rd page of sample label).
26	Limited access	Change 5 ppm to 1 ppm. Also in "Full Shift Worker Monitoring" (last paragraph) change from 0.3ppm to 0.5 ppm.
27	There are no appropriate colorimetric tubes for sulfuryl fluoride.	Only real-time monitoring device (e.g. Interscan or MIRAN) is appropriate.
28	Monitoring of workers in an enclosed area should be continuous.	Absolute minimum monitoring should be every 2 hours.
31	Common walls	This may be addressed by "Connected area" section in the ProFume label (3 rd page of sample label).
32	Limited access section	See comments for page 26
34	Use of Halide torch	Use real-time detector for leak detection.
37	Condition 8. Sample equipment	Fumscope must be re-introduced or vented to outside.
42	"Aeration outside of fumigation enclosure"	Change 5 ppm to 1 ppm
44	"Condition 15...less than 5 ppm..."	Change to "1 ppm"

Adapting Methyl Bromide Commodity Fumigation Conditions to Profume continued

45	There are no appropriate colorimetric tubes for sulfuryl fluoride.	See page 27 comments
62	Test Procedure for MBr Retention	Is this an appropriate test for SF? Yes.
80	Chart 1	Are the treatment and aeration buffer zone determinations for MBr appropriate for SF? Yes
Suggested Permit Conditions		
Number	Section	Notation
2	D: Fumiscope	The Interscan and MIRAN are used only for worker exposure levels to SF on the outside. A Fumiscope is used detect levels of MBr or SF in chambers. 150 ppm – 240,000 ppm.
4	Treatment and aeration zones	Are the definitions of the treatment and aeration zones appropriate? Yes
5	# 1&2 Max MBr rate is the same as SF, but the total MBr per work site not to exceed 1000 lbs./24 hr. appears to conflict with the need to use the conditions when the SF does exceed 4500 lbs.	Current language is correct. The 1000 lb. limit applies to chambers, containers, and other enclosures that are not nonresidential facilities. The 4500 lb limit applies to nonresidential facilities.
6	#9	Would purging be the same for SF as MBr? Yes
10&13	Aeration during daylight does not apply for fumigations with standard height stacks. Does this apply to SF also? In the ENF letter attachment 1 with less than 4500 lbs. SF used, night aeration is prohibited.	Yes. Night aeration using standard height stacks is allowed for chambers, containers, and other enclosures that are not nonresidential facilities. Night aeration is not allowed for nonresidential facilities even if they meet the standard height requirements.
13	Page 7. ProFume labeling does not give a clear time requirement for aeration prior to movement of commodity or allowing others near the product, other than actively aerate food commodity for a minimum of 24 hours prior to offering to consumers, however, the Suggested Permit Condition #13, p. 7, gives minimum times of 4 hours of mechanical or 12 hours of passive ventilation.	There is not conflict here. The label requires 24hr aeration of the commodity prior to offering to consumers. This can be interpreted to mean that some or all of this aeration may occur outside the chamber or fumigation enclosure. The permit conditions require 4 hr active aeration or 12 hr passive aeration before commodity can be removed from the chamber or fumigation enclosure.
46	Completeness of aeration	Substitute “real-time detector (e.g. Interscan)” for “detector tube” and “1 ppm” for “5 ppm”
47	Detector tube readings	“Real time monitoring reading”
48-50	Enclosed Storage	Change all “5 ppm” to “1 ppm”. See page 28 comments.
51-53		See page 27/28
54	Detector tube readings	“Real time monitoring reading”